



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

COPY

July 25, 2006

Via Certified Mail
Return Receipt Requested

US EPA RECORDS CENTER REGION 5 COPY TO THE ATTENTION OF



SR-6J

Mr. Thomas Steib
Detrex Corporation
1100 N. State Road
Ashtabula, OH 44004

RE: U.S. EPA Conditional Approval of March 2006 Remedial Design / Remedial Action Work Plan for Resolution of DNAPL Releases - Detrex Source Control Area - Fields Brook Superfund Site - Ashtabula, Ohio - Docket No. - V-W-98-C-450

Dear Mr. Steib:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Remedial Design / Remedial Action Work Plan for Resolution of DNAPL Releases dated March 2006. This document has been the basis of lengthy discussions both within U.S. EPA and between U.S. EPA and Detrex Corporation. In our meeting of June 1, 2006 we walked the site and discussed possible modifications of the work plan. Based upon these discussions, U.S. EPA hereby approves the March 2006 Work Plan with the following conditions:

1. The collection trench will be moved closer to Fields Brook and extend east to west across the upland area of Detrex property (through the partially cleared area that runs north of the brook). Prior to trench installation, Detrex will provide U.S. EPA and Ohio EPA with an updated drawing showing the planned alignment and depths.
2. The trench will be excavated a minimum of 3 feet into the till. The bottom will be sloped to provide drainage to groundwater collection sumps.
3. The investigative work to define DNAPL extent to the south and to evaluate movement towards the DS Tributary will be completed with hollow stem augers instead of geoprobes.
4. Detrex will collect groundwater/DNAPL bail down data from several wells that contain DNAPL to evaluate recovery rates and the extent of DNAPL migration pathways.
5. Detrex will substitute test pits for several of the original geoprobe locations planned in the DS Tributary. Test pit locations will be selected based on utility limitations.
6. Based upon the results on the work near the DS Tributary, additional investigative work may be required to develop a complete understanding of how DNAPL is entering the DS Tributary and to evaluate whether the current remedy is performing appropriately, or if other actions need to be put in place.

- 11/9/05
17. Detrex shall prepare a concise work plan addendum to outline steps to evaluate and investigate the DNAPL release seen on the north bank of Fields Brook just west of the old North Sewer outfall. This addendum may be presented in letter form and shall be submitted to U.S. EPA within 2 weeks of your receipt of this letter.

In addition to the above noted conditions, Ohio EPA has identified several issues that must be noted and, where appropriate, addressed in future submittals:

1. Section 2.2, middle of first paragraph: "...no VOCs were detected above limit." For future submittals, please clarify any limits used for comparisons.
2. Section 2.2, middle of second paragraph: If Detrex considers the detections of TCE in monitoring wells 17D and 18D to be a "result of cross contamination," then provide some documentation or further explanation of the reasons for this statement. *In discussions with Detrex, U.S. EPA has also previously questioned the cross contamination determination.*
3. Section 2.2, last paragraph: A conclusion is made "that there are no complete pathways for DNAPL to migrate from the source area...to Fields Brook." This conclusion seems out of place in a work plan for investigating DNAPL releases. It is a pre-conclusion that there is nothing to be found. Future submittals should not draw conclusions before investigative work is complete.
4. Section 2.3, first paragraph, first sentence: "...the lacustrine clay does not contain VOCs, SVOCs, or any indication of DNAPL." This, again, is a pre-conclusion. It would be better to say that URS did not find VOCs, SVOCs, or DNAPL in the September 2005 investigation.
5. Section 2.3.1.2, first paragraph, first sentence: The sentence appears to be incomplete, "...this investigation to VOC plume..."

Please move forward with the required work and advise U.S. EPA of your anticipated field schedule. If you have any questions concerning the terms of the conditional approval please don't hesitate to contact me at 312-353-6564.

Sincerely,



 Terese A. Van Donsel
Remedial Project Manager

cc: S. Jaffess / EPA-R5
P. Felitti / EPA-R5
T. Johnson / EPA-ERT Las Vegas
R. Williams / OEPA
M. Schmidt / URS
T. Doll / Detrex
R. Currie / Detrex
Site File - Fields Brook / Detrex